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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-0134SOM-03
)	
Plaintiff,)	MOTION FOR DEPARTURE DOWNWARD
)	IN SENTENCING DEFENDANT LANI
VS.)	ANN BREWER
)	
LANI ANN BREWER,	(03))	Sentencing date: 6/12/07 at
)	10:30 a.m., before the Hon.
)	Susan Oki Mollway, U.S.
Defendant.)	District Judge
_____)	

MOTION FOR DOWNWARD DEPARTURE
IN SENTENCING DEFENDANT LANI ANN BREWER

The United States of America, by and through its undersigned counsel, hereby moves this Honorable Court to depart downwards in imposing sentence upon defendant Lani Ann Brewer, due to her substantial assistance to and cooperation with law enforcement authorities in the investigation or prosecution of other persons who have committed an offense.

This motion is made pursuant to U.S. Sentencing Commission Guideline 5K1.1, and is based upon the information contained in

the sealed "Factual Basis for Motion for Departure Downward in Sentencing Defendant", filed concurrently herewith.

DATED: Honolulu, Hawaii, June 11, 2007.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Michael K. Kawahara
MICHAEL K. KAWAHARA
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known addresses:

Served by First Class Mail:

Mr. Michael J. Green
345 Queen St., Second Floor
Honolulu, HI 96813

June 11, 2007

Attorney for Defendant
Lani Ann Brewer

Served by hand-delivery:

Probation Officer
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Box 50111, Rm. C-126
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June 11, 2007

/s/ Rowena N. Kang